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Via ECFS

March 18, 2018

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., S.W.
Washington, D.C. 20554

Re: Petition of Pioneer Telephone Cooperative, Inc. For Waiver of 47 C.F.R. Sections 36.3, 36.123-126, 36.141, 36.152-157, 36.191 and 36.372-382 To Unfreeze Part 36 Category Relationships. CC Docket No. 80-286.

Ex Parte filing

Dear Ms. Dortch:

On March 15, 2018 Jim Eaton, Nick Kretchmar, Sharon Minor, Chad Duval and I, representing Pioneer Telephone Cooperative, Inc. met with Lisa Hone, Pamela Arluk, William Kehoe, Edward Krachmer and Douglas Slotten of the Wireline Competition Bureau to discuss Pioneer's pending petition referenced above. Messrs. Eaton, Kretchmar and Duval and Ms. Minor participated by telephone.

The Pioneer representatives noted that its waiver petition, now pending five years, asked only that the Commission act in accordance with its 2001 promise that carriers electing to freeze their separations factors would be allowed to unfreeze them in 2006. Should the Commission in the future determine the public interest would be served by offering regulated companies the opportunity to take voluntary action conditioned upon a right to reverse that action in the at a later date, the failure to act in this case will deter companies from making such elections.

When it made its election in 2001, Pioneer reasonably relied on the Commission's statement that the freeze would last no more than five years and reasonably expected that its investments and expenses would remain relatively stable over that period. Since 2006, however, the industry has changed significantly and Pioneer has made substantial investments which the frozen separations factors allocate excessively to the intrastate jurisdiction. In addition, Oklahoma has decided to phase out a portion of its state universal service support program. Both

of these factors could have negative impacts on Pioneer and its customers, as a result of lost cost recovery and cross subsidization of services due to inappropriate categorization of investment.

Pioneer representatives replied to general questions regarding the effects of the freeze on its regulated services and noted that it had elected ACAM support.

Please address any questions in this matter to me.

Respectfully submitted

David Cosson
Counsel to Pioneer Telephone Cooperative, Inc.

cc:

Lisa Hone
Pamela Arluk
William Kehoe
Edward Krachmer
Douglas Slotten